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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WYATT ASH-MILBY,

Defendant.

Case No. 3:20-cr-00241-SI

**UNOPPOSED MOTION TO
CONTINUE TRIAL**

NOW COMES Wyatt Ash-Milby, through his attorney, Gerald M. Needham, and moves to continue the presently scheduled trial date of January 26, 2021, to March 2, 2021, or a date thereafter convenient to the Court. This motion is unopposed by the government. January 26, 2021, is the third trial setting.

Mr. Ash-Milby has entered into a deferred resolution agreement with the government. The agreement requires him to complete a number of hours of community service. Due to the ongoing pandemic, completing his community service has taken longer than is typically required. As such, additional time is required by Mr. Ash-Milby to complete his community service.

Additionally, defense counsel is in need of additional time to properly prepare if this matter were to proceed to trial.

Mr. Ash-Milby has authorized counsel to represent he consents to the continuance with the knowledge that the timeframe is excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), as well as § 3161(h)(2).

Assistant United States Attorney Parakram Singh has authorized counsel to represent the government has no objection to this motion.

Based on the aforementioned, counsel moves to continue the trial of January 26, 2021, to March 2, 2021, or a date thereafter convenient to the Court. The timeframe of the requested continuance is excludable from Speedy Trial computations pursuant to 18 U.S.C. § 3161(h)(7)(A), as the ends of justice served by the granting of the continuance outweigh the interests of the public and the defendant in a speedier trial.

Respectfully submitted on January 19, 2021.

/s/ Gerald M. Needham

Gerald M. Needham

Assistant Federal Public Defender